

# **EXHIBIT A**

CN: 2220298632

**SN: 1**

PC: 2

FILED

9/1/2022

Timothy W Fitzgerald  
Spokane County Clerk

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SPOKANE

MARK ALLEN PLEASANT and TRALEN  
ROBERT DOLER,

Plaintiffs,

vs.

SPOKANE CIVIC THEATRE and SPOKANE  
CHILDREN'S THEATRE, DOES 1-10,

Defendants.

NO. 22-2-02986-32

SUMMONS (21 DAYS)

**TO DEFENDANT SPOKANE CHILDREN'S THEATRE:** A lawsuit has been started against you in the above-entitled court by Mark Allen Pleasant and Tralen Robert Doler, plaintiffs in the above-named action. Plaintiffs' claims are stated in the written Complaint for Damages, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the claims by stating your defense in writing, and by serving a copy upon the person signing this summons within 21 days

1 after the service of this summons, excluding the day of service, or a default judgment may be  
2 entered against you without notice. A default judgment is one where the plaintiff is entitled to  
3 what he asks for because you have not responded. If you serve a notice of appearance on the  
4 undersigned person, you are entitled to notice before a default judgment may be entered.

5 You may demand that the plaintiff file this lawsuit with the court. If you do so, the  
6 demand must be in writing and must be served upon the person signing this summons. Within 14  
7 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service  
8 on you of this summons and complaint will be void.

9 If you wish to seek the advice of an attorney in this matter, you should do so promptly  
10 so that your written response, if any, may be served on time.

11 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the  
12 State of Washington.

13  
14 DATED this 29<sup>th</sup> day of August, 2022.

15  
16 JAMES, VERNON & WEEKS, P.A.

17  
18 \_\_\_\_\_  
19 Melanie E. Baillie, WSBA #55832  
20 1626 Lincoln Way  
21 Coeur d'Alene, Idaho 83814  
22 Telephone: (208) 667-0683  
23 Facsimile: (208) 664-1684  
[mbaillie@jvwlaw.net](mailto:mbaillie@jvwlaw.net)  
Attorneys for Plaintiffs

CN: 2220298632

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SPOKANE

MARK ALLEN PLEASANT and TRALEN  
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SPOKANE CIVIC THEATRE and SPOKANE  
CHILDREN'S THEATRE, DOES 1-10,

Defendants.

NO. 22-2-02986-32

SUMMONS (21 DAYS)

**TO DEFENDANT SPOKANE CIVIC THEATRE:** A lawsuit has been started against you in the above-entitled court by Mark Allen Pleasant and Tralen Robert Doler, plaintiffs in the above-named action. Plaintiffs' claims are stated in the written Complaint for Damages, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the claims by stating your defense in writing, and by serving a copy upon the person signing this summons within 21 days

1 after the service of this summons, excluding the day of service, or a default judgment may be  
2 entered against you without notice. A default judgment is one where the plaintiff is entitled to  
3 what he asks for because you have not responded. If you serve a notice of appearance on the  
4 undersigned person, you are entitled to notice before a default judgment may be entered.

5 You may demand that the plaintiff file this lawsuit with the court. If you do so, the  
6 demand must be in writing and must be served upon the person signing this summons. Within 14  
7 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service  
8 on you of this summons and complaint will be void.

9 If you wish to seek the advice of an attorney in this matter, you should do so promptly  
10 so that your written response, if any, may be served on time.

11 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the  
12 State of Washington.

13  
14 DATED this 29<sup>th</sup> day of August, 2022.

15  
16 JAMES, VERNON & WEEKS, P.A.

17 *Melanie Baillie*

18 \_\_\_\_\_  
19 Melanie E. Baillie, WSBA #55832  
20 1626 Lincoln Way  
21 Coeur d'Alene, Idaho 83814  
22 Telephone: (208) 667-0683  
23 Facsimile: (208) 664-1684  
[mbaillie@jvwlaw.net](mailto:mbaillie@jvwlaw.net)  
Attorneys for Plaintiffs

CN: 2220298632

**SN: 3.0**

PC: 11

FILED

9/1/2022

Timothy W Fitzgerald  
Spokane County Clerk

THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SPOKANE

MARK ALLEN PLEASANT and TRALEN  
ROBERT DOLER,

Plaintiffs,

vs.

SPOKANE CIVIC THEATRE and SPOKANE  
CHILDREN'S THEATRE, DOES 1-10,

Defendants.

NO. 22-2-02986-32

COMPLAINT FOR DAMAGES

Plaintiffs, by and through their attorney of record, Melanie Baillie of the firm JAMES,  
VERNON, & WEEKS, P.A., hereby state and allege as follows:

**I. INTRODUCTION**

1.1. This complaint is based on the childhood sexual abuse of Plaintiffs caused by  
Defendants' negligent, reckless, and tortious acts and omissions.

COMPLAINT FOR DAMAGES - 1

**JAMES, VERNON & WEEKS, P.A.**  
1626 Lincoln Way  
Coeur d'Alene, Idaho 83814  
Phone: (208)667-0683  
Fax: (208) 664-1684

1 **II. PARTIES**

2 2.1 Plaintiffs incorporate by reference all other paragraphs of this Complaint as if  
3 fully set forth herein.

4 2.2 PLAINTIFFS Plaintiff Mark Pleasant is a resident of the State of Idaho.  
5 Plaintiff Tralen Doler is a resident of the State of New York. At all times material hereto,  
6 Plaintiffs were minor children who participated in activities offered by the Spokane Civic  
7 Theatre and/or the Spokane Children's Theatre.

8 2.3 DEFENDANT SPOKANE CIVIC THEATRE (also referred to herein as "Civic  
9 Theatre") is a Washington public benefit corporation established on September 6, 1947, with  
10 UBI number 600144421. The Defendant Civic Theatre has its principal office address at 1020  
11 N. Howard Street, Spokane, Washington 99201.

12 2.3.a Said Defendant may be served with process through its registered agent  
13 Witherspoon Brajcich McPhee PLLC, 601 W Main Ave., Suite 714, Spokane, Washington,  
14 99201 pursuant to RCS 23.95.610 as it continues to be a domestic entity who may be served  
15 through its registered agent.

16 2.4 DEFENDANT THE SPOKANE CHILDREN'S THEATRE, INC.. (also referred  
17 to herein as "Children's Theatre") is a Washington State public benefit corporation established  
18 June 8, 1964, with UBI number 601615085. The Defendant Children's Theatre has its principal  
19 place of business located at 2727 N. Madelia St., Ste 5, Spokane Washington 99207.

20 2.4.a Said Defendant may be served with process through its registered agent Doug  
21 Beschta, 2727 N. Madelia St., Ste 5, Spokane, Washington 99207.

1 **III. JURISDICTION AND VENUE**

2 3.1 Plaintiffs incorporate by reference all other paragraphs of this Complaint as if  
3 fully set forth herein.

4 3.2 This Court has jurisdiction over Defendants and each of them pursuant to  
5 R.C.W. 4.28.185(1)(b) because each of the Defendants committed tortious act(s) within the  
6 state of Washington. The amount in controversy exceeds \$100,000 for each Plaintiff exclusive  
7 of interest, costs and attorney fees.

8 3.3 Venue is proper under R.C.W. 4.12.020(3) because substantial events, acts,  
9 and/or omissions arose in Spokane County, Washington, and some of the Defendants reside in  
10 this county.

11 **IV. STATEMENT OF FACTS**

12 4.1 Plaintiffs incorporate by reference all other paragraphs of this Complaint as if  
13 fully set forth herein.

14 4.2 At all times material hereto, and upon information and belief, Scott Dunckley  
15 (also referred to herein as "Dunckley") was an adult volunteer, participant, agent, and  
16 benefactor in both Defendants Civic Theatre and Children's Theatre from 1987 until 2001.

17 4.3 Scott Dunckley was involved with productions at the Defendants Civic Theatre  
18 and Children's Theatre as a volunteer, and was the technical advisor of the Civic Theatre's  
19 children's performance troupe in which both Plaintiffs participated.

20 4.4 Scott Dunckley began ingratiating himself to Plaintiff Pleasant in 1987, when  
21 Plaintiff Pleasant was 14 years old, and Dunckley was 24 years old. Dunckley would provide  
22 Plaintiff with alcohol at cast parties and other theatre events.



1           4.5     As a trusted agent for and on behalf of the Children's Theatre and the Civic  
2 Theatre, Dunckley began giving Plaintiff Pleasant rides to and from rehearsals in 1987.

3           4.6     Dunckley began grooming and then sexually molesting Plaintiff Pleasant in  
4 1987.

5           4.7     Upon information and belief, in 1989 Plaintiff Pleasant revealed the sexual  
6 abuse to the Theatre leadership.

7           4.8     Despite its knowledge of Dunckley's molestation of Plaintiff Pleasant, the  
8 Theatre leadership failed to take action and continued to cast Dunckley and allowed Dunckley  
9 to continue to participate in, have access to, and authority over, children participating in its  
10 programs and, specifically, Plaintiff Pleasant.

11          4.9     Plaintiff Pleasant began seeing a counselor where he revealed Dunckley's sexual  
12 abuse. The counselor reported the abuse to Child Protective Services and the Spokane Police  
13 Department.

14          4.10    Plaintiff Pleasant was seen as the culprit in the theatre community for the sexual  
15 abuse Dunckley perpetrated on him. Rumors about Plaintiff Pleasant began to culminate and  
16 spread, and Dunckley framed himself as the victim.

17          4.11    Neither the leadership of the Children's Theatre nor the Civic Theatre  
18 discharged Dunckley for his abuse of Plaintiff, reported Dunckley to authorities, or even  
19 investigated Plaintiff's disclosure of sexual abuse.

20          4.12    Both Defendants controlled the method and means in which Dunckley executed  
21 his duties for each of them. Oversight of his activities was the responsibility of both the  
22 Children's Theatre Board and the Civic Theatre Board during the time he was sexually  
23 molesting Plaintiff Pleasant.

COMPLAINT FOR DAMAGES - 4

**JAMES, VERNON & WEEKS, P.A.**  
1626 Lincoln Way  
Coeur d'Alene, Idaho 83814  
Phone: (208)667-0683  
Fax: (208) 664-1684

1           4.13    Upon information and belief, Dunckley promulgated and disseminated said false  
2 statements about Plaintiff Pleasant as a result of the disclosure by Plaintiff Pleasant regarding  
3 Dunckley's sexual molestation of him. Both Defendants adopted said false statements without  
4 investigation.

5           4.14    Plaintiff Doler became involved in activities at the Civic Theatre at the age of  
6 11. Plaintiffs became friends while performing in the Civic Theatre's children's performing  
7 troupe.

8           4.15    In 1991, Plaintiffs attended a cast party sponsored by the Defendant Civic  
9 Theatre.

10          4.16    As a result of the narrative advanced by theatre leadership and Dunckley  
11 regarding Plaintiff Pleasant's allegations against Dunckley, a theatre volunteer approached  
12 Plaintiff Doler and his mother stating that Plaintiff Doler needed to be careful around Plaintiff  
13 Pleasant, but did not warn Plaintiff Doler or his mother about Dunckley.

14          4.17    In 1991, Dunckley, through his role and apparent authority on behalf of the  
15 Defendant Civic Theatre, began to ingratiate himself to Plaintiff Doler and his family including,  
16 but not limited to, villainizing Plaintiff Pleasant. Dunckley groomed Plaintiff Doler sexually.

17          4.18    In Approximately 1992 Dunckley began sexually abusing Plaintiff Doler, who  
18 was then 13 years old.

19          4.19    At all times material hereto, each Defendant had a special relationship with each  
20 Plaintiff, as Plaintiffs were theatre members participating in one or both of Defendants'  
21 programs, and Defendants had custody and control of Plaintiffs while they were attending  
22 rehearsals, performances, and social functions sponsored, controlled, supervised, and led by the  
23 Defendants.

1           4.20 At all times material hereto, Defendants had a special relationship with Scott  
2 Dunckley who was an adult volunteer, consultant, benefactor, and participant for Defendants,  
3 and who was cloaked with authority and/or apparent authority to act on behalf of the  
4 Defendants.

5           4.21 Defendants knew or should have known that Dunckley was a pedophile and was  
6 abusing children. Each Defendant had a duty to warn or protect foreseeable victims including  
7 plaintiffs.

8           4.22 Each Defendant had a duty to report Dunckley's sexual abuse or suspected  
9 sexual abuse of children to authorities but failed to do so.

10          4.23 But for each Defendant's breach of duty, acts, and omissions, Plaintiffs would  
11 not have been sexually abused by Dunckley.

12          4.24 As a direct and proximate result of the molestation and breach of trust and each  
13 Defendant's breaches of duty, each plaintiff has suffered and will continue to suffer physical  
14 and emotional pain and dysfunction and general, non-economic damages in an amount to be  
15 determined at trial. As a further direct and proximate result of the sexual abuse, each plaintiff  
16 has incurred/or will continue to incur costs for counseling and psychological treatment and has  
17 lost earning capacity due to this damage in an amount to be proven at trial.

## 18                           **V. NEGLIGENCE AND GROSS NEGLIGENCE**

### 19           **5. General Breach of Duty**

20          5.1 Plaintiffs incorporate by reference all other paragraphs of this Complaint as if  
21 fully set forth herein.

22          5.2. Defendants, and each of them, had a special relationship with each Plaintiff  
23 while each Plaintiff was a minor participating in Defendants' programs. Each Defendant knew

COMPLAINT FOR DAMAGES - 6

**JAMES, VERNON & WEEKS, P.A.**  
1626 Lincoln Way  
Coeur d'Alene, Idaho 83814  
Phone: (208)667-0683  
Fax: (208) 664-1684

1 or reasonably should have foreseen the heightened risks of sexual abuse of children, including  
2 Plaintiffs, and had a duty to warn or protect foreseeable victims, including each Plaintiff.

3 5.3. Defendants and each of them were on notice of an extremely dangerous  
4 condition, including specifically Dunckley's risk to sexually abuse minor boys.

5 5.4. At all relevant times, Defendants, and each of them, were mandatory child abuse  
6 reporters pursuant to RCW 26.44.030.

7 5.5. Defendants and each of them breached both a statutorily prescribed duty and  
8 common law duties of reasonable care by failing to report to authorities known abuse risks to  
9 the Plaintiffs.

10 5.6. Defendants breached a common law duty of reasonable care by failing to protect  
11 or warn each Plaintiff or each Plaintiff's parents of the dangers of Scott Dunckley.

12 5.7. Defendants, and each of them, as owners and/or possessors of the land upon  
13 which they knowingly/or negligently allowed Dunckley to groom and sexually abuse Plaintiffs,  
14 had a common law duty to protect Plaintiffs from an unreasonable risk of harm arising from  
15 Dunckley's presence on the property.

16 5.8. But for the Defendants' breaches of duty, acts, and omissions, each Plaintiff  
17 would not have been abused.

18 5.9. Defendants and each of them failed to train and supervise their agents and  
19 employees (1) in the proper creation and implementation of guidelines, policies, and procedures  
20 regarding the treatment of child sexual abuse victims; (2) to monitor and insure compliance  
21 with guidelines, policies, and procedures, and (3) in reporting child sexual abuse.

1           5.10. Defendants also failed to properly investigate allegations of abuse by Dunckley  
2 and failed to reach out and provide services to his victims.

3           5.11. Defendants knew, or in the exercise of reasonable care should have known, that  
4 their failure to erect reasonable barriers to pedophiles' entry into their organization or to timely  
5 adopt policies and practices addressing the problem of pedophilic infiltration and abuse of  
6 children, including each Plaintiff, created an unreasonable risk of harm to participants in their  
7 programs.

8           5.12. Defendants' negligence, breaches of duty, and resulting molestation of each  
9 Plaintiff by their agent, Scott Dunckley, were direct and proximate causes of special and general  
10 damages to each Plaintiff, including past and future physical and emotional pain and  
11 dysfunction and general, noneconomic damages in an amount to be determined at trial. As a  
12 further result of the sexual abuse, each Plaintiff has incurred or will continue to incur costs for  
13 counseling and psychological treatment and has lost earning capacity due to this damage in an  
14 amount to be proved at trial.

15           **5.13 Negligent Failure To Protect**

16           5.13.a At all times material hereto, each Defendant had certain duties imposed upon it  
17 by law. Each Defendant owed each Plaintiff a duty of care to protect them and other children  
18 against harm caused by their agents and, specifically, their agent Scott Dunckley.

19           5.13.b Each Defendant breached said duties by, *inter alia*, acting under circumstances  
20 or conditions likely to produce great bodily harm to each Plaintiff and other children,  
21 negligently permitting each Plaintiff to suffer unjustifiable harm, negligently permitting each  
22 Plaintiff or the health of each Plaintiff to be injured, or negligently permitting each Plaintiff to  
23 be placed in such a situation that each Plaintiff's person and health was endangered, including

COMPLAINT FOR DAMAGES - 8

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1 by each Defendant's failure to terminate their relationship with Dunckley and to report the  
2 abuse to authorities.

3 5.13.c The Defendants and each of them failed to comply with the standard of care for  
4 a nonprofit organization and its leaders who become aware, or should have become aware, of  
5 child sexual abuse under the same or similar circumstances and who have care, custody and  
6 control of vulnerable persons, including Plaintiffs, through Plaintiffs' participation in the events  
7 and activities of the Defendants, as well as through the Defendants' involvement in assisting  
8 and continuing to allow Dunckley to maintain access to the Plaintiffs, without supervision or  
9 oversight.

10 5.13.d Each Defendant's breaches of duty to each Plaintiff directly and proximately  
11 caused life-long, ongoing, and profound damages to each Plaintiff as further alleged herein.

12 5.13.e As a direct and proximate result of each Defendant's acts, omissions,  
13 negligence, gross negligence and tortious conduct, each Plaintiff was tragically, seriously, and  
14 permanently injured and damaged. Although some supportive remedies have been resorted to,  
15 said injuries prevail and will continue to prevail for an indefinite time into the future. It is  
16 difficult, if not impossible, at this time to fix the full nature, extent, severity, and duration of  
17 said injuries, but they are alleged to be permanent, progressive, and disabling. Each Plaintiff  
18 has incurred, and will likely continue to incur, damages. These damages include both severe  
19 physical and emotional injury. These damages include special and general damages to be  
20 proven at the time of trial, in an amount now unknown. Plaintiffs' damages specifically include  
21 all damages allowed by statute and common law.  
22  
23



**VI. NEGLIGENT RETENTION AND SUPERVISION  
BY DEFENDANTS**

6.1. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

6.2 At all times material, Defendants Civic Theatre and Children's Theatre employed Dunckley as a volunteer for and on behalf of Defendants.

6.3 Defendants knew or, in the exercise of ordinary care, should have known of Scott Dunckley's unfitness at the time it engaged him and that he posed a risk to children.

6.4 Defendants' actions in engaging Dunckley, and cloaking him with authority, provided Dunckley the ability to have access to, groom, and sexually assault Plaintiffs.

6.5 Despite having known of allegations related to Dunckley's sexual misconduct, Defendants retained and continued to support Dunckley, and placed him in a position of authority and trust over Plaintiffs.

6.6 Defendants' negligent retention and supervision of Dunckley, directly and proximately caused each Plaintiff's resulting injuries and damages as further alleged herein.

**VIII. PRAYER FOR RELIEF**

WHEREFORE Plaintiffs, and each of them, pray that the Court enters judgment in favor of each Plaintiff and against each Defendant for the following:

A. Special damages for medical treatment expenses, lost earnings, lost earning capacity, expenses of medication and other special expenses, both in the past and continuing into the future, in amounts to be determined at the time of trial;

1           B.     General damage for physical, mental and emotional injury and disturbance, pain,  
2 suffering and other general damages resulting from the Defendants' acts and omissions  
3 complained of herein;

4           C.     For attorney fees, prejudgment interest, costs allowed by law; and

5           D.     For such other relief as this Court determines just.

6           DATED August 29, 2022.

7  
8                               JAMES, VERNON & WEEKS, P.A.

9  
10                            By: Melanie Baillie  
                              Melanie Baillie WSB#55832  
                              Attorneys for Plaintiffs



CN: 2220298632

**SN: 4.0**

PC: 1

FILED

9/1/2022

Timothy W Fitzgerald

Spokane County Clerk

THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SPOKANE

MARK ALLEN PLEASANT and TRALEN  
ROBERT DOLER,

Plaintiffs,

vs.

SPOKANE CIVIC THEATRE and SPOKANE  
CHILDREN'S THEATRE, DOES 1-10,

Defendants.

NO. 22-2-02986-32

JURY DEMAND

TO: Defendants herein

The undersigned elects to have this case tried by a jury of twelve (12) members and  
herewith deposits with the Clerk of the Court the jury fee as required by law.

DATED this 25th day of June, 2021.

JAMES, VERNON & WEEKS, P.A.

*Melanie Baillie*

Melanie E. Baillie WSBA #55832

Attorneys for Plaintiffs

CN: 2220298632


**SN: 5.0**

PC: 1

**FILED****SEPTEMBER 1, 2022**Timothy W Fitzgerald  
Spokane County Clerk

(Copy Receipt)

Clerk's Date Stamp

 <p><b>SUPERIOR COURT OF WASHINGTON COUNTY OF SPOKANE</b></p>	<p><b>JUDGE TIMOTHY B. FENNESSY 94</b></p>
<p>PLEASANT, MARK ALLEN ETAL</p> <p><b>Plaintiff(s)/Petitioner(s),</b></p> <p><b>vs.</b></p> <p>SPOKANE CIVIC THEATRE ETAL</p> <p><b>Defendant(s)/Respondent(s).</b></p>	<p><b>CASE NO. 22-2-02986-32</b></p> <p><b>CASE ASSIGNMENT NOTICE AND ORDER (NTAS)</b></p> <p><b>CASE STATUS CONFERENCE DATE: DECEMBER 2, 2022 AT 8:30 AM</b></p>

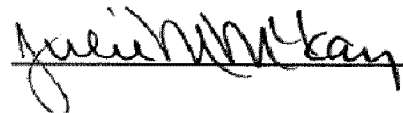
**ORDER**

YOU ARE HEREBY NOTIFIED that this case is preassigned for all further proceedings to **JUDGE Timothy B. Fennessy**.

**You are required to attend a Case Status Conference before your assigned judge on the date also noted above. The Joint Case Status Report must be completed and brought to the Status Conference. A Case Schedule Order, with the trial date, will be issued at the Status Conference.**

Under the individual calendar system, the court will operate on a four-day trial week. Trials will commence on Monday, Tuesday, Wednesday or Thursday. Motion Calendars are held on Friday. All motions, other than ex parte motions, must be scheduled with the assigned judge. Counsel must contact the assigned court to schedule motions and working copies of all motion pleadings must be provided to the assigned court at the time of filing with the Clerk of Court. Pursuant to LCR 40 (b) (9), motions must be confirmed no later than 12:00 noon three days before the hearing by notifying the judicial assistant for the assigned judge.

Please contact the assigned court to schedule matters regarding this case. You may contact the assigned court by phone, court department e-mail or through the Spokane County Superior Court web page at <https://www.spokanecounty.org/4625/Superior-Court>

**DATED: 09/01/2022**

JULIE M. MCKAY  
PRESIDING JUDGE

**NOTICE: The plaintiff shall serve a copy of the Case Assignment Notice on the defendant(s).**

CN: 2220298632

**SN: 6.0**

PC: 3

FILED  
10/26/2022  
Timothy W Fitzgerald  
Spokane County Clerk

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

MARK ALLEN PLEASANT and TRALEN  
ROBERT DOLER,

Plaintiffs,

v.

SPOKANE CIVIC THEATRE and SPOKANE  
CHILDREN'S THEATRE, DOES 1-10,

Defendants.

No. 22-2-02968-32

NOTICE OF APPEARANCE

TO: All parties and your attorneys:

YOU WILL PLEASE TAKE NOTICE that the undersigned attorneys hereby appear of  
record on behalf of defendant SPOKANE CIVIC THEATRE.

You are hereby requested to serve all further notices and motions and pleadings, except  
process, in this cause upon said attorneys at their offices at 601 W. Main Ave., Suite 1400,  
Spokane, WA 99201-0677.

NOTICE OF APPEARANCE- 1



WITHERSPOON  
BRAJCICH  
MCPHEE

A PROFESSIONAL LIMITED LIABILITY COMPANY  
601 West Main Avenue, Suite 1400  
Spokane, Washington 99201-0677  
Telephone: (509) 455-9077  
Fax: (509) 624-6441

1 DATED this 4th day of October, 2022.

2  
3 WITHERSPOON BRAJCICH MCPHEE, PLLC

4  
5  
6 By:   
7 James A. McPhee, WSBA No. 26323  
8 Attorneys for Defendant Spokane Civic Theatre  
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NOTICE OF APPEARANCE- 2

**WBM** | WITHERSPOON  
BRAJCICH  
MCPHEE

A PROFESSIONAL LIMITED LIABILITY COMPANY

601 West Main Avenue, Suite 1400  
Spokane, Washington 99201-0677  
Telephone: (509) 455-9077  
Fax: (509) 624-6441

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served by the method indicated below to the following this 4th day of October, 2022.

☐ U.S. MAIL  
☐ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX) to:  
☒ EMAIL TO:  
mbaillie@jvwlaw.net

James, Vernon & Weeks, P.A.  
Melanie Baillie  
1626 Lincoln Way  
Coeur D'Alene, ID 83814

☐ U.S. MAIL  
☐ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX) to:  
☒ EMAIL TO:  
wms@witherspoonkelley.com

Witherspoon Kelley, P.S.  
William Symmes  
422 W. Riverside Ave, Suite 1100  
Spokane, WA 99201

  
Briana Mullendore

CN: 2220298632

**SN: 7.0**

PC: 3

FILED  
10/26/2022  
Timothy W Fitzgerald  
Spokane County Clerk

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

MARK ALLEN PLEASANT and TRALEN  
ROBERT DOLER,

No. 22-2-02986-32

Plaintiffs,

ACCEPTANCE OF SERVICE

v.

SPOKANE CIVIC THEATRE and SPOKANE  
CHILDREN'S THEATRE, DOES 1-10,

Defendants.

1. ACCEPTANCE OF SERVICE

James A. McPhee, attorney for Spokane Civic Theatre, hereby accepts service of:

- Summons filed on September 1, 2022; and
- Complaint filed on September 1, 2022.

The undersigned, by signature, acknowledges that he is authorized to accept service on  
behalf of Defendant Spokane Civic Theatre.

ACCEPTANCE OF SERVICE- 1



WITHERSPOON  
BRAJCICH  
MCPHEE

A PROFESSIONAL LIMITED LIABILITY COMPANY  
601 West Main Avenue, Suite 1400  
Spokane, Washington 99201-0677  
Telephone: (509) 455-9077  
Fax: (509) 624-6441

1 DATED 4<sup>th</sup> day of October 2022.  
2  
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5 WITHERSPOON BRAJCICH MCPHEE, PLLC  
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7 JAMES A. MCPHEE, WSBA No. 26323  
8 Attorney for Defendant Spokane Civic Theatre  
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ACCEPTANCE OF SERVICE- 2

**WBM** | WITHERSPOON  
BRAJCICH  
MCPHEE

A PROFESSIONAL LIMITED LIABILITY COMPANY

601 West Main Avenue, Suite 1400  
Spokane, Washington 99201-0677  
Telephone: (509) 455-9077  
Fax: (509) 624-6441

**CERTIFICATE OF SERVICE**


I hereby certify that the foregoing was served by the method indicated below to the following this 4th day of October, 2022.

☐ U.S. MAIL  
☐ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX) to:  
☒ EMAIL TO:  
mbaillie@jvwlaw.net

James, Vernon & Weeks, P.A.  
Melanie Baillie  
1626 Lincoln Way  
Coeur D'Alene, ID 83814

☐ U.S. MAIL  
☐ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX) to:  
☒ EMAIL TO:  
wms@witherspoonkelley.com

Witherspoon Kelley, P.S.  
William Symmes  
422 W. Riverside Ave, Suite 1100  
Spokane, WA 99201

  
Briana Mullendore

ACCEPTANCE OF SERVICE- 3



WITHERSPOON  
BRAJICH  
MCPHEE

A PROFESSIONAL LIMITED LIABILITY COMPANY  
601 West Main Avenue, Suite 1400  
Spokane, Washington 99201-0677  
Telephone: (509) 455-9077  
Fax: (509) 624-6441



CN: 2220298632

**SN: 8.0**

PC: 1

FILED

10/31/2022

Timothy W Fitzgerald

Spokane County Clerk

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR  
THE COUNTY OF SPOKANE

**MARK ALLEN PLEASANT AND TRALEN ROBERT  
DOLER**

Plaintiff(s),

vs.

DECLARATION OF SERVICE

**SPOKANE CIVIC THEATRE AND SPOKANE  
CHILDRENS THEATRE DOES 1-10**

Defendant(s).

ss.

That on 10/10/2022 at 12:52 PM, at the address of 601 WEST MAIN AVE #1400 , Spokane, within SPOKANE County, WA, the undersigned duly served the following document(s): **AMENDED SUMMONS COMPLAINT FOR DAMAGES** in the above entitled action upon **SPOKANE CIVIC THEATRE**, by then and there personally delivering 1 true and correct copy(ies) of the above documents into the hands of and leaving same with **JAMES MCPHEE, REGISTERED AGENT** who is authorized to accept service on behalf of the above.

Desc: Sex: **Male** - Skin/Race: **Caucasian** - Hair: **Bald** - Age: **50'S** - Height: **6ft 03in** - Weight: **180 lbs**

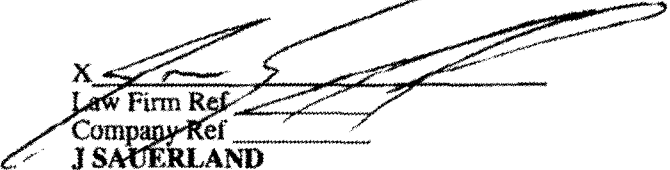
I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

Date: 10-14-22

TOTAL: \$



\*28512\*

X   
Law Firm Ref \_\_\_\_\_  
Company Ref \_\_\_\_\_  
**J SAUERLAND**  
Registered Process Server  
License#: **1672**  
Eastern Washington Attorney Services  
421 WEST RIVERSIDE #772  
Spokane, WA 99201  
5093277018

CN: 2220298632

**SN: 9.0**

PC: 2



ices

FILED

10/31/2022

Timothy W Fitzgerald  
Spokane County Clerk**BILL TO**JAMES VERNON AND WEEKS  
1626 LINOCLN WAY  
COEUR D'ALENE, ID 83814**INVOICE 135937**

DATE 10/20/2022 TERMS Net 30

DUE DATE 11/19/2022

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
process service	SPOKANE CHILDRENS THEATRE AT 2727 N MADELIA SPOKANE WA	1	45.00	45.00

TOTAL DUE

**\$45.00**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR  
THE COUNTY OF SPOKANE

MARK ALLEN PLEASANT AND TRALEN ROBERT  
DOLER

Plaintiff(s),

vs.

DECLARATION OF SERVICE

SPOKANE CIVIC THEATRE AND SPOKANE  
CHILDRENS THEATRE DOES 1-10

Defendant(s).

ss.

That on **10/19/2022** at **10:00 AM**, at the address of **2727 NORTH MADEIRA ST #5**, Spokane, within **SPOKANE** County, WA, the undersigned duly served the following document(s): **AMENDED SUMMONS COMPLAINT FOR DAMAGES** in the above entitled action upon **SPOKANE CHILDRENS THEATRE**, by then and there personally delivering 1 true and correct copy(ies) of the above documents into the hands of and leaving same with **TONYA BROWNING**, **INTERIM MANAGING AGENT** who is authorized to accept service on behalf of the above.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

Date: 10/21/22

TOTAL: \$



\*28513\*

X *D Cronkhite*  
Law Firm Ref \_\_\_\_\_  
Company Ref \_\_\_\_\_  
**D CRONKHITE**  
Registered Process Server  
License#: 1820  
Eastern Washington Attorney Services  
421 WEST RIVERSIDE #772  
Spokane, WA 99201  
5093277018